

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Patterson Dental Supply, Inc.,
Plaintiff,

Civ. No.: 0:19-cv-01940-JNE-LIB

v.

Daniele Pace and Henry Schein, Inc.,
Defendant.

**DECLARATION OF ELLIOTT
CARSON IN OPPOSITION TO
DEFENDANTS' MOTION TO
COMPEL DISCOVERY, FOR A
PROTECTIVE ORDER, AND FOR
SUPPLEMENTATION AND DE-
SIGNATION OF DISCLOSURES**

I, Elliott Carson, state as follows:

1. I am the General Manager of the Denver location for Patterson Dental Supply, Inc. ("Patterson"). I submit this Declaration in connection with Plaintiff's Opposition to Defendants' Motion to Compel Discovery, for a Protective Order, and for Supplementation and Re-Designate Patterson's Disclosures. I make this Declaration based upon my personal knowledge.

2. Patterson's customer information and sales and profit information are highly confidential in nature.

3. Patterson's Second Supplemental Disclosures ("Disclosures") contains such highly sensitive and confidential information. It includes names of Patterson customers, annual sales figures attributable to those customers, and Patterson's associated profit margins.

4. Patterson and Defendant Henry Schein, Inc. ("Henry Schein") are fierce competitors in the dental equipment and supply industry. The disclosure of the information

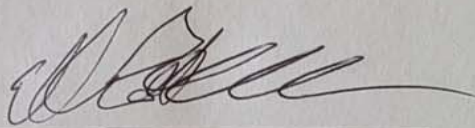
contained in Patterson's Disclosures to Henry Schein would put Patterson at a serious competitive disadvantage.

5. Defendant Daniele Pace ("Pace") was involved in Patterson's sales efforts with all of the customers listed in Patterson's Disclosures during her employment in Patterson's Denver branch.

6. Providing Pace and her team at Henry Schein, as well as other sales employees at Henry Schein, with access to this list of customers and detailed financial information regarding these customers, would be highly detrimental to Patterson.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that everything I have stated in this document is true and correct to the best of my knowledge.

Signed this 2 day of November 2020.
County of Denver, State of Colorado



Elliott Carson